



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

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Federal Communications Commission
Office of the Secretary

OCT 22 2008

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket N. 06-150; PS Docket No. 06-229

Dear Chairman Martin:

On behalf of the U.S. Department of Agriculture (USDA), I would like to file comments related to the Commission's consideration of further rules for the 700 MHz D-Block auction. I want to commend you for creating this unique opportunity to develop a nationwide interoperable public safety network. Your vision to create a public/private partnership to serve first responders and commercial services is the kind of bold, innovative approach we need to jump-start the next generation of wireless services. We support your goal to bond the D-Block with public safety services.

It is central to the mission of USDA to stimulate economic development and promote public safety in rural America. We have a long tradition of nurturing deployment of telecommunications systems in rural areas, including helping to close coverage gaps and promoting broadband services. The 700 MHz allocation provides rural America not only the opportunity to participate in an interoperable emergency communications network but also the ability to take part in the communications revolution and enjoy the benefits of the broadband age. USDA has financing programs that have traditionally assisted rural deployment, and we envision a unique opportunity for the Federal government to jump-start our efforts. The Federal Communications Commission can help ensure that rural America stays in lockstep with its urban counterparts via the development of a truly national 700 MHz public/private interoperable emergency communications network. As you develop the D-Block auction rules I would ask you to consider the following:

1. *Ensure build-out in rural areas.* For rural citizens and first responders, coverage is everything. If 700 MHz licensees only build out networks in the densely populated areas, we will have fumbled our Nation's best opportunity to deploy broadband nationwide. Emergencies can happen anywhere, and if the D-Block is going to be a true national emergency communications network, services have to be available in sparsely populated rural areas.

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Certainly, the Commission must attempt to strike the right balance between aggressive and strong build-out requirements with the economic realities of deploying a broadband network. The Commission has the power to ensure that licensees are making progress toward covering geographic area, not just population. The Commission can foster effective build-out through the following:

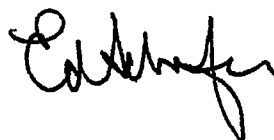
- Impose strong geographic build-out requirements on the licensees;
- Use bidding credits to reward licensees who can exceed the build requirements conditioned in the auction to encourage faster build-out; and
- The build requirements should ensure that the D-Block spectrum is built quickly. Licensees should be restricted from using other spectrum assets to meet the build-out requirements specified by the Commission.

2. *Ensure national interoperability.* To ensure national interoperability is a second imperative for the D-Block. The Commission should allow bidders the option to establish large geographic areas by permitting combinatorial bidding. This has proven successful in past auctions, and the Commission should allow combinatorial bidding in the D-Block auction too. This could minimize disperse licensees, simplify interference mitigation, and enhance interoperability. The more separate the licensees get from a national footprint, the more difficult it is to address adjacent license interference and ensure interoperability of multiple systems. The Commission should address and resolve as many issues as possible in the auction rules and should increase clarity and predictability for the public safety community and the prospective bidders.

A successful auction of the D-Block with conditions that will enable the deployment of a national, interoperable emergency communications network is of the utmost importance in protecting our homeland. I salute your efforts to achieve this goal through the public/private partnership of a joint use network. You are making a significant contribution to our society, and I hope that you and your fellow Commissioners will act soon to set up the auction rules and proceed with this important matter.

As USDA implements the 2008 Farm Bill, I look forward to meeting with you to discuss our joint efforts in preparing for Congress a comprehensive rural broadband strategy as required by Section 6112 of the bill.

Sincerely,



Edward T. Schafer
Secretary

cc: Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell